

# APPENDIX 4

LIST	NAME	BIRTHDATE	AGE	D.O.H.	DOT	Age at DOT	TermReason	Location	Current Job Title	SALARY
1	Howard, John A.	03/23/34	68	07/09/56	07/09/99	65	Retirement	Fitchburg	MGR. MFG. SVC	66,338.00
2	Sylvia, Joseph L.	04/11/45	57	08/10/70	11/30/99	54	Resigned	Fitchburg	VP FINANCE CFO	193,253.00
3	Derivera, Eric O.	04/02/57	45	01/03/89	12/31/99	42	Resigned	Fitchburg	SR. MFG. ENGINEER	71,167.00
4	Ackles, Nancy P.	12/28/32	69	07/20/66	01/07/00	67	RIF	Fitchburg	WORD PRO. SEC.	28,202.00
5	Larsen, Ronald	11/08/38	63	09/30/69	01/07/00	61	RIF	Fitchburg	PLANT OPERATIONS	92,700.00
6	Sylvester, Amy L.	03/10/67	35	08/21/87	01/07/00	32	Resigned	Fitchburg	COST ANALYST	33,410.72
7	Walsh, Robert L.	01/06/60	42	11/12/96	01/21/00	40	Resigned	Fitchburg	CUSTOMER SERVICE	39,720.00
8	Devilling III, Frank A.	12/06/41	60	11/17/95	01/31/00	58	terminated	Fitchburg	VP BUSINESS DEVELOP	120,120.00
9	Chase, John W	01/31/49	53	11/17/97	02/17/00	51	resigned	Fitchburg	CREDIT MANAGER	63,440.00
10	Souliere, Richard A.	04/17/41	61	06/17/71	08/27/00	59	Retired	Fitchburg	UNIT MANAGER	63,162.00
11	Carnivale, James J.	05/27/44	57	10/17/90	09/30/00	56	Retired	Fitchburg	HUMAN RESOURCES MGR.	76,977.00
12	Ilewicz, Robert L.	09/03/59	42	05/26/98	12/18/00	41	terminated	Fitchburg	PRINCIPAL R&D ENGINEER	69,628.00
13	Harvey, Steven R.	11/29/49	52	02/28/83	01/12/01	51	Resigned	Fitchburg	SERIOR ACCOUNTANT	59,760.96
14	Owens, Ronald W	11/30/44	57	03/31/98	03/31/01	56	Retired	Fitchburg	SR. VUP OF MANUFACTURING OPERA	151,400.04
15	Byrom, Andrew M.	06/22/71	30	07/29/96	04/06/01	29	resigned	Fitchburg	TERRITORY MGR	38,500.00
16	Balcom, Wayne A.	02/08/36	66	04/18/60	05/04/01	65	Retirement	Fitchburg	UNIT MANAGER	48,241.00
17	Alberghini, Louis P.	08/30/40	61	04/19/82	05/31/01	60	RIF	Fitchburg	PROJECT ENG	66,393.00
18	Brown, Barry	10/21/47	54	07/15/85	05/31/01	53	RIF	Fitchburg	PRINCIPAL ENGINEER	79,376.04
19	Baker, William B.	05/07/62	40	04/05/99	05/31/01	39	RIF	Fitchburg	QUALITY ASSURANCE MANAGER	66,144.00
20	Schofield, Betty E	07/11/54	47	11/05/84	06/01/01	46	Resigned	Fitchburg	HR ASSIST & TRAINING COORD	33,325.00
21	Niemi, Steven R.	07/29/69	32	01/25/93	06/25/01	31	Resigned	Fitchburg	SUPERVISOR MANUFACTURING ENG	77,112.00
22	Edson Jr., Raymond F.	02/26/43	59	03/20/89	06/30/01	58	Retired	Fitchburg	DIRECTOR OF ENGINEERING	96,255.00
23	Daring, Todd R	03/30/62	40	05/19/97	07/23/01	39	RIF	Fitchburg	UNIT MANAGER	45,211.00
24	Whitcomb, Ralph E.	12/06/50	51	12/10/79	08/10/01	50	terminated	Fitchburg	MANAGER CORPORATE ACCOUNTING	75,348.00
25	Martin, Jeffrey R.	07/31/45	56	06/29/01	08/10/01	56	Resigned	Fitchburg	PLANT CONTROLLER	84,000.00
26	Gruytch, Stephen R.	09/06/37	64	08/09/66	08/31/01	63	RIF	Fitchburg	SR ACCT MGR	63,996.00
27	Jordan, John W.	07/30/47	54	01/07/85	08/31/01	54	Retired	Fitchburg	FITCHBURG PLANT MANAGER	97,759.92
28	Rodriguez, Jesus	02/25/56	46	11/30/99	08/31/01	45	RIF	Fitchburg	INSIDE SALES	33,325.00
29	Manktelow, David W.	06/05/44	57	12/08/69	09/14/01	57	RIF	Fitchburg	MATERIAL COORD	41,161.42
30	Carnivale, Jeffrey J.	03/03/71	31	02/14/94	09/14/01	30	RIF	Fitchburg	PROD MGR	51,500.00
31	George, Ross B	11/29/32	69	10/20/80	09/15/01	68	Retired	Fitchburg	President	108,333.16
32	Breen, Marcia F.	09/14/51	50	09/19/88	09/21/01	50	RIF	Fitchburg	COST ANALYST	30,030.00
33	Kozloski, Robert J.	10/17/39	62	08/26/64	11/02/01	62	RIF	Fitchburg	MGR SYSTEMS & PROG INFOR SER	41,643.16
34	Zirpolo, Joanne	04/12/54	48	12/27/88	11/02/01	47	RIF	Fitchburg	SWITCHBOARD/RECEPTION	23,982.14
35	Schutt, Jeffrey A.	05/07/56	46	05/22/79	11/30/01	45	RIF	Fitchburg	MGR LEAN MFG	71,999.98
36	Meatney, Stephen M.	06/24/54	47	04/09/86	11/30/01	47	RIF	Fitchburg	UNIT MANAGER	43,724.98
37	Bennett, Walter H.	11/08/47	54	07/23/01	11/30/01	54	RIF	Fitchburg	PRODUCTION SUP	58,000.00
38	Bastien, Richard	09/01/52	49	03/27/72	12/07/01	49	RIF	Fitchburg	PAYROLL COORD	39,243.10
39	Kamerkar, Udayan S.	12/24/46	55	08/01/01	01/18/02	55	Resigned	Fitchburg	SR FINANCIAL ANALYST	57,000.06

Simonds Industry  
Fitchburg Employees

40	Day, Charles R.	03/14/59	43	10/05/92	03/01/02	42	resigned	Fitchburg	MARKETING MANAGER OF FILES	75,012.08
41	Boyd, Jeffrey T.	01/12/58	44	02/08/88	05/17/02	44	resigned	Fitchburg	STAFF ACCOUNTANT	44,006.04
42	Fletcher, Walter L.	11/15/38	63	06/18/56				Fitchburg	METHOD ENGINEER	50,556.00
43	Mansfield, Cary W.	06/03/40	61	05/25/59				Fitchburg	UNIT MANAGER	60,639.02
44	Richard, Roland R.	01/08/42	60	05/31/61				Fitchburg	VP MKT S	145,999.36
45	Evancie, Ernest A.	01/12/37	65	08/21/61				Fitchburg	CHIEF METALLURGIST	46,764.64
46	Stewart, Dennis I.	01/03/43	59	10/22/62				Fitchburg	UNIT MANAGER	57,972.98
47	Mundie, Robert R.	10/08/44	57	11/17/64				Fitchburg	MASTER SCHEDULER	49,683.92
48	Marien, Robert L.	12/27/42	59	06/01/65				Fitchburg	UNIT MANAGER	49,959.00
49	Bourgeois, David J.	09/14/47	54	05/25/67				Fitchburg	DIRECTOR OF CUSTOMER SATISFAC	103,000.04
50	Richards, Ronald	10/25/48	53	03/03/69				Fitchburg	UNIT MANAGER	50,718.98
51	Thomas, Paul R.	10/28/48	53	08/12/69				Fitchburg	GENERAL FOREMAN RULE	51,205.96
52	Decosta, Kathleen A.	02/14/48	54	08/28/69				Fitchburg	INSIDE SALES REP	36,800.92
53	Jalbert, John T.	12/12/46	55	05/11/70				Fitchburg	MANAGER PRICING ADMINISTRATION	65,583.18
54	Rogers, Harry H.	04/12/41	61	03/22/71				Fitchburg	VP INTERNATIONAL	100,000.00
55	Burdick, Robert A.	03/30/46	56	08/23/71				Fitchburg	TECH SUPPORT SPEC	73,070.14
56	Howe, Rachel A.	10/10/52	49	12/16/71				Fitchburg	SR COST ACCOUNTANT COORDINATO	41,246.14
57	Richard, Joan A.	07/19/44	57	05/01/72				Fitchburg	INSIDE SALES REP	37,557.00
58	Peabody, Paula A.	06/21/52	49	06/19/72				Fitchburg	BENEFITS COORDINATOR	36,132.98
59	Myer, Kenneth R.	03/08/50	52	09/18/72				Fitchburg	VP PROCUREMENT	116,549.94
60	Long, Sandra L.	07/18/47	54	12/04/72				Fitchburg	SR. ACCOUNT MANAGER	53,152.06
61	Kifer, John C.	07/07/53	48	05/21/73				Fitchburg	DIRECTOR OPERATION FINANCE	106,808.00
62	Deedrick, Robert W.	12/04/42	59	06/11/73				Fitchburg		66,273.74
63	Bourque, James J.	09/23/51	50	06/25/73				Fitchburg	DIRECTOR FITCH/NEWC. PLANT	115,000.08
64	Mundie, Norma J.	02/16/54	48	07/16/73				Fitchburg	CUSTOMER ASSURANCE EXP	35,921.08
65	Hagelberg, Donald O.	07/17/47	54	11/26/73				Fitchburg	UNIT MANAGER	60,498.88
66	Lashua, Edward V.	06/18/45	56	12/17/73				Fitchburg	TRAINING ADMINISTRATOR	51,500.02
67	Vaine, Richard M.	10/06/55	46	06/10/74				Fitchburg	SUPR. DATA PROC OPER	60,900.06
68	Cairns, Judith	06/21/38	63	06/25/74				Fitchburg	TAPE LIBRARIAN	29,371.16
69	Bent, Nancy J.	08/20/37	64	10/18/76				Fitchburg	EXECUTIVE ADMINISTRATIVE ASSIST	58,263.14
70	Frenette, Richard J.	05/27/55	46	06/05/78				Fitchburg	MGR. INTERNATIONAL SALES OFFICE	68,027.44
71	Marrella, Sandra M.	05/27/41	60	02/20/79				Fitchburg	DATA CONTROL/DATA ENTRY	29,500.12
72	Logan, William S.	05/17/58	44	08/20/79				Fitchburg	ASSOC METALLURGICAL ENGINEER	46,685.08
73	Goodchild, Loretta A.	02/06/42	60	11/05/79				Fitchburg	INSIDE SALES REP	35,661.60
74	Economo, Barbara A.	10/08/45	56	08/11/80				Fitchburg	INSIDE SALES REP	37,765.00
75	Heraty, Bridget	11/30/50	51	04/13/81				Fitchburg	VP SALES N.A.	83,838.04
76	Chi, Ronald S. Y.	12/31/47	54	02/22/82				Fitchburg	MARKETING MANAGER METAL	76,992.24
77	Phelps, Jane L.	02/08/47	55	08/30/82				Fitchburg	PT ACCTG. CLERK	13,592.80
78	Durrin, Lynda A.	05/15/50	52	03/24/83				Fitchburg	AR CORRESPONDENT	27,867.06
79	Thibodeau, Ilda M.	03/16/51	51	05/02/83				Fitchburg	DIRECTOR HUMAN RESOURCES	78,832.00

Simonds Industry  
Fitchburg Employees

80	Lefourneau, Renee	05/06/62	40	05/09/83			Fitchburg	EXECUTIVE SECRETARY	24,128.00
81	Bray, Margaret	10/22/51	50	03/26/84			Fitchburg	SR COMP. & BENEFITS COORDINATOR	37,672.96
82	Cochran, Philip A.	12/29/62	39	10/30/84			Fitchburg	SR FINANCIAL ANALYST	53,044.16
83	Lanides, Victoria	07/21/43	58	09/25/85			Fitchburg	SAFETY & HEALTH COORD	33,758.40
84	Bateman Jr., William G.	04/23/52	50	03/02/87			Fitchburg	SR MFG FINANCIAL ANALYST	54,836.06
85	Purinton, David J.	08/28/61	40	08/03/87			Fitchburg	MARKETING MGR. WOOD PRODUCTS	85,995.06
86	Rocca, Norma	11/16/52	49	12/01/87			Fitchburg	INTERNATIONAL INSIDE SALES	36,228.14
87	Mattson Jr., Donald E.	11/25/51	50	01/11/88			Fitchburg	SR PROG ANALYST	56,727.06
88	Page, Jan L.	08/29/50	51	02/29/88			Fitchburg	STEEL PROC./PURCHASE SPEC	56,795.96
89	Mallet, Charles E.	05/24/58	43	09/26/88			Fitchburg	POWER TOOL ACCESSORY PROD MGR	68,959.02
90	Varville, Mary A.	05/11/50	52	10/24/88			Fitchburg	MARKETING SECRETARY	33,699.96
91	Magnette, Barbara J.	01/31/67	35	12/06/88			Fitchburg	EXEC SEC	36,961.66
92	Boudreau, Kevin P.	11/19/59	42	05/01/89			Fitchburg	COMPUTER OPERATOR	30,735.90
93	Pfeiffer, Eric J.	12/03/57	44	05/01/94			Fitchburg	MARKET DEVELOPMENT MANAGER	93,120.04
94	Burns, Mary Kathleen	11/05/50	51	07/05/94			Fitchburg	CREDIT CORRESPONDENT	30,567.16
95	Hautanen, Elena B.	09/30/52	49	02/27/95			Fitchburg	INSIDE SALES REP	31,296.20
96	Palmer, James E.	02/13/41	61	03/31/95			Fitchburg	VP SALE & MKTG. METAL PRODUCT	146,000.14
97	Bourgeois, David R.	01/07/67	35	11/20/95			Fitchburg	FITCHBURG PLANT CONTROLLER	84,460.22
98	Szocik, Thomas	02/10/50	52	06/17/96			Fitchburg	FACILITY MANAGER	70,181.02
99	Hopper, Peter B.	12/15/50	51	07/29/96			Fitchburg	VP PROD DEVELOPMENT & QUALITY	108,555.98
100	Hutchins, Sharon	08/21/55	46	12/30/96			Fitchburg	SR. PRO ANALYST	60,765.12
101	Nally, Theresa	11/29/39	62	02/03/97			Fitchburg	AR CORRESPONDENT	24,727.04
102	Roy, Raymond P.	07/10/61	40	02/10/97			Fitchburg	CUST. SERVICE SPEC.	41,184.00
103	Jones, Alan D.	03/07/59	43	05/05/97			Fitchburg	SR. SYSTEMS ANALYST	69,000.10
104	Carfaro, David P.	02/03/69	33	06/30/97			Fitchburg	COMPUTER OPERATOR	29,908.06
105	Sierra, Carlos	05/11/70	32	10/01/97			Fitchburg	FINANCIAL MGR. RULE PRO	47,380.06
106	Edmands, S. Karl	05/18/54	47	06/01/98			Fitchburg	UNIT MANAGER	46,846.80
107	St.Amand, Brenda A.	07/29/50	51	05/17/99			Fitchburg	CONTROL CLERK	30,963.14
108	Martino, Raymond J.	08/27/54	47	09/15/99			Fitchburg	President & Ceof	389,549.94
109	Holm Jr., Harold E.	01/26/56	46	02/01/00			Fitchburg	VP MANUFACTURING	165,000.16
110	Reeves, Jennifer L.	04/18/78	24	02/22/00			Fitchburg	AP CLERK	23,986.04
111	Turano, Matthew	06/09/63	38	03/06/00			Fitchburg	INSIDE SALES REP	34,608.08
112	Hytinen, Eric	12/21/68	33	03/22/00			Fitchburg	CREDIT MANAGER	56,800.12
113	Botticello, Henry J.	04/05/56	46	04/01/00			Fitchburg	CHIEF FINANCIAL OFFICER	192,000.12
114	Caselli, Susan T.	11/08/55	46	05/01/00			Fitchburg	V.P. INFORMATION TECH AND CIO	138,000.20
115	Benoit, Paul R.	11/14/50	51	05/08/00			Fitchburg	VP SUPPLY CHAIN MANAGEMENT	135,000.06
116	Dexter, Jeremy	09/23/77	24	07/17/00			Fitchburg	PROCESS METALLURGIST MFG. ENG	54,912.00
117	Brault, Richard A.	09/02/52	49	08/14/00			Fitchburg	ENGINEERING MGR FITCHBURG PLAN	75,899.98
118	Morrison, Douglas	08/03/60	41	07/01/01			Fitchburg	PROJECT MGR	81,900.00
119	Duperry, Peter A.	02/23/78	24	07/23/01			Fitchburg	PRODUCT ENGINEER	49,920.00

Simonds Industry  
Fitchburg Employees

120	Santoro, Salvatore	08/29/46	55	08/06/01			Fitchburg	QUALITY MANAGER	74,900.02
121	Boissoneau, Donald M.	11/22/60	41	08/13/01			Fitchburg	CORPORATE CONTROLLER	98,800.00
122	Reeves, Mark A.	12/25/62	39	08/28/01			Fitchburg	PROD & INVENTORY CONTROL	66,999.92

## APPENDIX 5

1 saying, you know, we need more.

2 Q. And at the time that you were  
3 preparing this budget information, was it your  
4 understanding that you were preparing this  
5 information because it was your annual operating  
6 budget or because you were preparing it because  
7 there was some financial difficulties in the  
8 company?

9 MR. FELPER: Objection.

10 A. As I stated, it was a kind of a  
11 cornerstone of Mr. Martino's management  
12 directives that there be year-to-year savings,  
13 good times or bad. Basically if the company was  
14 profitable, it would be more profitable. If you  
15 can't increase sales, you need to reduce costs.  
16 If you can increase sales, you still need to  
17 reduce costs to be more profitable. So it was  
18 clear to me that the directive to have  
→19 year-over-year cost savings was to be conducted  
20 in any environment.

21 Q. Who made the decision to ultimately  
22 terminate Ron Larsen, Lou Alberghini and Jim --  
23 is it Bourque or Burke (phonetically)?

24 A. Burke (phonetically).



1 Q. And Dick Souliere?

2 A. Ray Martino.

3 Q. Who was present when he made that  
4 decision?

5 A. Myself and Ron Owens.

6 Q. Back to your memo of August 21 which  
7 was Exhibit 1.

8 MR. FELPER: Two.

9 Q. Two. Where you state, "I personally  
10 identified over \$1 million in annual operating  
11 expenses that could be eliminated." You  
12 identified those, that 1 million because you were  
13 told by Mr. Martino to find -- identify the  
14 1 million to eliminate?

15 A. Yes.

16 Q. And the next sentence says, "These  
17 included outside" -- these --

18 A. Outside services.

19 Q. -- "services" -- excuse me --  
20 "purchased items and indirect labor and salaried  
21 positions." Initially you came up with outside  
22 services and purchased items; is that accurate?

23 A. Yes, because that was the classic way  
24 to approach the budget was for foremen and union



1           A.    He would have reported to Steve Neimi  
2           who was manager of engineering at the time.

3           Q.    Mr. Neimi?

4           A.    N-e-i-m-i.

5           Q.    Did Mr. Neimi ever tell you the reason  
6           why Mr. Alberghini was terminated in May of 2001?

7           A.    No.

8           Q.    Did anyone ever tell you why  
9           Mr. Alberghini was terminated in May of 2001?

10          A.    Chip Holm called a -- called a meeting  
11          that afternoon or the very next day, telling us  
12          about, you know, the organization, the  
13          engineering department was changed, Lou  
14          Alberghini, Barry Brown, Bill Baker are no longer  
15          with us. Didn't give an explanation per se,  
16          not -- not a good one.

17          Q.    Are you aware of an analysis being  
18          done in all sectors of Simonds in late 1999  
19          including manufacturing to see if operations  
20          could be made more efficient, product activity  
21          could be increased and costs reduced?

22          A.    An analysis?

23          Q.    Yes.

24          A.    No. I mean, I've talked about the

1 the same time?

2 A. Yes.

3 Q. You said when Chip Holm came to tell  
4 you and another person that Mr. Baker and Lou  
5 Alberghini and Mr. Brown had been laid off, you  
6 said that it was not a good one. What did you  
7 mean by that?

8 A. I didn't leave the meeting with any  
9 information. I guess it was more of a courtesy  
10 to say, you know, you're hearing it from me  
11 first. Again, there was a -- I hate to  
12 characterize it as feeble -- but there was a --  
13 was sort of a feeble attempt to explain it, but I  
14 didn't come away with the meeting with any  
15 information other than that those three are no  
16 longer with us.

17 Q. Other than when at the time that you  
18 directly supervised Lou Alberghini for the one  
19 and a half years that you told us about, did you  
20 indirectly supervise him because someone else  
21 underneath you supervised him?

22 A. Well, I had as plant manager -- let me  
23 think about the chronology. For the very short  
24 time between his rehire and me no longer being

1 Q. Out of the ten years that you received  
2 a bonus, what year did you receive your highest  
3 bonus?

4 A. That would have been at 2001.

5 Q. 2000 or 2001? I'm sorry.

6 A. For the year 2000 which was -- but was  
7 paid in 2001 I got my largest bonus while at  
8 Simonds.

9 Q. And I understand. And that was  
10 \$18,000?

11 A. Yes, I believe so.

12 Q. Sir, what is the bonus based upon?

13 A. Gross -- gross profit percentage,  
14 gross profit dollars and some inventory reduction  
15 goals. The plan would change somewhat year to  
16 year. I've got them with me, but those are  
17 basically the three factors.

18 Q. Did that fact that you received that  
19 bonus give you any indication of the  
20 profitability of the company in that year?

21 A. It's not profit-sharing per se, but it  
22 would be a very good indicator of plant  
23 profitability. I couldn't -- I wouldn't know  
24 about corporate profitability based on, you know,

1 much akin to some of the same duties, and I did  
2 manage the entire engineer department on an  
3 interim basis due to the absence of another  
4 manager, so the answer is yes.

5 MS. ELLIOTT: Mark this as Exhibit 5,  
6 please.

7 (Document marked as Exhibit No. 5 for  
8 identification.)

9 Q. Also based upon your knowledge of  
10 Mr. Alberghini's background and his experience  
11 and so forth, and as his manager for some period  
12 of time, was Mr. Alberghini qualified to perform  
13 this project engineer position description you  
14 have in front of you?

15 MR. FELPER: Objection.

16 A. Yes.

17 Q. Would he be qualified to perform the  
18 project engineering position that you described  
19 in your own words?

20 A. Yes.

21 MR. FELPER: Objection.

22 Q. I'm going to show you what's been  
23 marked as Exhibit 5, and if you could just for  
24 the record just give us a short description of

1 what the document purports to be?

2 A. It's a job description of a product  
3 engineer reporting to the engineering manager,  
4 prepared in May, May 3rd of 2001, listing the  
5 primary function and the duties and  
6 responsibilities of a product engineer.

7 Q. And had you had an opportunity to see  
8 this document before?

9 A. Just yesterday.

10 Q. And prior to yesterday, had you ever  
11 seen it before?

12 A. No.

13 Q. And Mr. Alberghini left the employment  
14 of Simonds when; do you recall?

15 A. I don't recall. I don't recall. I  
16 think it was June 2001.

17 Q. Going over -- if you could just take a  
18 moment and go over the essential duties and  
19 responsibilities listed in this job description  
20 for a moment.

21 A. Yeah.

22 Q. If you could just please just read for  
23 the record the first essential duty and  
24 responsibility that's listed on this job

1 description?

2 MR. FELPER: I'm going to object. If  
3 the document's an exhibit, why do we have to  
4 clutter the record with what's already on the  
5 exhibit.

6 MS. ELLIOTT: Because I want it on the  
7 record what the document says.

8 MR. FELPER: It's an exhibit.

9 MS. ELLIOTT: Well, I don't see  
10 there's any reason for that objection.

11 MR. FELPER: I can't stop you from  
12 having him answer, but if we're going to read the  
13 whole document, then I'm going to have an  
14 objection.

15 MS. ELLIOTT: He's not going to read  
16 the whole document.

17 A. "Improve, maintain or design as needed  
18 quality control systems to insure that product  
19 specifications are being met by the manufacturing  
20 process for assigned product line."

21 Q. Now, with regard to that statement  
22 which is described as an essential duty and  
23 responsibility of the engineer, the product  
24 engineer, is there any -- based upon your

1 knowledge of Mr. Alberghini's experience,  
2 qualifications and knowledge, is there any reason  
3 why he could not perform that first essential  
4 duty and responsibility of the product engineer?

5 MR. FELPER: Objection.

6 A. No.

7 Q. The second item, essential duty, says  
8 "Analyze return goods complaints (as prepared by  
9 the QC technician) and develop corrective actions  
10 for process improvements within the assigned  
11 product line."

12 Is there any reason, based upon your  
13 knowledge of Mr. Alberghini's education,  
14 experience and knowledge, that he could not  
15 perform that essential duty and responsibility?

16 MR. FELPER: Objection.

17 A. No.

18 Q. Based upon your knowledge of  
19 Mr. Alberghini's experience, education, and  
20 knowledge, is there any reason why he couldn't  
21 perform a third duty on the -- listed as the  
22 essential duty and responsibility of a product  
23 engineer?

24 MR. FELPER: Objection.



1 A. No.

2 Q. Is there any essential duty or  
3 responsibility listed on Exhibit 5 that you would  
4 have concerns that Mr. Alberghini, based upon  
5 your knowledge of his experience, education, and  
6 knowledge, could not perform?

7 MR. FELPER: Objection.

8 A. No.

9 Q. And further, based upon your knowledge  
10 of his experience, education, and education and  
11 experience, again relating to his experience at  
12 Simonds Industries specifically, are there any  
13 job essential duties and responsibilities listed  
14 on this job description that Mr. Alberghini could  
15 not perform or that you would have concerns of  
16 him being able to perform?

17 MR. FELPER: Objection.

18 A. No.

19 Q. Did Mr. Alberghini have any physical  
20 limitations to your knowledge?

21 MR. FELPER: Objection.

22 A. No.

23 Q. Did he have any work environment  
24 limitations to your knowledge?

1 A. No.

2 Q. Did Mr. Alberghini have any  
3 supervisory experience?

4 A. Yes.

5 Q. And what was the basis of his  
6 supervisory experience at Simonds Industries?

7 A. Well, he was an electrical foreman, a  
8 plant services manager. Those two positions I'm  
9 aware of.

10 Q. Now, it indicates here on this product  
11 engineer job description under supervisory  
12 responsibilities, this person who qualifies for  
13 his job is supposed to be able to supervise  
14 hourly personnel in maintaining and refining  
15 current manufacturing techniques within the  
16 assigned product line. Supervises other members  
17 of manufacturing group as needed on a project  
18 basis as assigned by the engineering manager.

19 Based upon your knowledge of Mr.  
20 Alberghini's supervisory experience, is there any  
21 reason why he could not perform that supervisory  
22 responsibility as an engineering product --

23 A. No.

24 MR. FELPER: Objection.

1 Q. Product engineer?

2 MR. FELPER: Objection.

3 A. No.

4 Q. Did Mr. Alberghini have at least a  
5 two-year college degree or university  
6 certificate?

7 MR. FELPER: Objection.

8 A. Yes.

9 Q. Do you know what Mr. Alberghini's  
10 degree was?

11 A. He obtained a bachelor's degree in  
12 engineering as an adult. I believe he had an  
13 associate degree prior, but I know he received a  
14 bachelor's degree as an adult in engineering.

15 Q. And at the time that he was employed  
16 at Simonds under your supervisory management, did  
17 he have that degree?

18 A. He obtained it just prior to. I  
19 became plant manager in June of 1999. He  
20 obtained it I would say just prior, within a year  
21 or two prior.

22 Q. Of 1999?

23 A. Right, yeah.

24 Q. Was there any problem with

1 Mr. Alberghini's language skills based upon your  
2 knowledge of his --

3 A. No.

4 Q. -- performance?

5 MR. FELPER: Objection.

6 A. No.

7 Q. Were you aware either from yourself or  
8 from others whether he had any problem with his  
9 reasoning ability?

10 A. No.

11 Q. Do you know if he had knowledge of ISO  
12 9000?

13 A. Yes.

14 Q. And what was his knowledge of ISO  
15 9000?

16 A. He would have obtained -- attended  
17 training sessions on the Simonds quality system  
18 which is ISO certified, so this is actually  
19 poorly -- I won't go into that.

20 Q. And do you know what his -- do you  
21 know whether he had any automotive industry based  
22 quality control system -- knowledge of any  
23 automotive industry based quality control  
24 systems?

1 A. No, he didn't but neither did Simonds.

2 Q. Where it says and "automotive industry  
3 based quality control systems" under  
4 certificates, licenses and registrations, that  
5 has nothing to do with Simonds Industries?

6 MR. FELPER: Objection.

7 A. Not to my knowledge.

8 Q. Just is Simonds in the automotive  
9 industry in any way?

10 MR. FELPER: Objection.

11 A. Peripherally.

12 Q. Peripherally?

13 A. Provide cutting tools for the  
14 automotive industry, but they're not a -- they're  
15 not that kind of a supplier whereby they need  
16 automotive industry certification in Fitchburg.

17 Q. Did you know either Jeremy Dexter or  
18 Mr. Dusperi during your employment at Simonds?

19 A. Yes.

20 Q. And what positions did they have in  
21 the company?

22 A. I know they were both in the  
23 engineering department. I believe Jeremy Dexter  
24 was a project engineer with a metallurgical

1 emphasis. The other fellow, I believe, was a  
2 project engineer/manufacturing engineer. I'm not  
3 aware of the titles.

4 Q. And how do you know whether those two  
5 gentlemen, Mr. Dusperi and Mr. Dexter, retained  
6 their positions after Mr. Alberghini was laid  
7 off?

8 A. I believe they did.

9 Q. And you may not know this  
10 specifically, but do you know whether Mr. Dexter  
11 and Mr. Dusperi -- actually when they were hired?

12 A. Do I remember when they were hired?  
13 Jeremy was a co-op student that worked one or two  
14 summers at Simonds, and we hired him upon his  
15 graduation from Worcester Tech possibly 1997 and  
16 the other --

17 Q. I'm sorry?

18 A. The other individual, I believe, is a  
19 friend who graduated with him at Worcester Tech,  
20 may have worked somewhere else for a very short  
21 time and came to Simonds, I'm going to say 1998,  
22 maybe 1999.

23 Q. And do you know approximately how old  
24 Mr. Alberghini was at the time of his layoff?

1 A. Around 60.

2 Q. And do you know approximately -- you  
3 may not know exactly -- how old Mr. Dusperi and  
4 Mr. Dexter are?

5 A. I would say 25.

6 Q. Are there any skills that  
7 Mr. Alberghini had or has that in your knowledge  
8 of his performance and education and experience  
9 and so forth and as his prior supervisor, whether  
10 he would have any skills that would make him more  
11 qualified for such a position as this product  
12 engineer position that we talked about in  
13 Exhibit 5?

14 MR. FELPER: Objection.

15 A. Well, it mentions, you know,  
16 occasionally supervise others on a project basis,  
17 so clearly there's a large discrepancy between  
18 Lou's supervisory experience and the other two  
19 fellows which I assume is none. Familiarization  
20 with the labor agreement is important for  
21 everybody, knowledge of how capital equipment is  
22 obtained. Just the experience he would have  
23 gained from being on the manufacturing staff for,  
24 you know, almost ten years would give him a much



1 stronger sense of the business and -- the  
2 business.

3 Q. Now, at least up until the time that  
4 you left Simonds, do you know whether Mr. Dexter  
5 or Mr. Dusperi did supervise any employees?

6 A. I don't think so.

7 Q. And up until the time that you left,  
8 do you know whether Mr. Dexter or Mr. Dusperi did  
9 any labor negotiations?

10 A. No, they wouldn't have.

11 Q. And up until the time that you left  
12 Simonds, do you know whether Mr. Dusperi or  
13 Mr. Dexter prepared any budget information?

14 A. No.

15 Q. You don't know whether they did?

16 A. They wouldn't have.

17 Q. They wouldn't have. Do you know up  
18 until the time that you left whether Mr. Dusperi  
19 and Mr. Dexter would have had any responsibility  
20 for performing anyone's performance review?

21 A. No, they wouldn't have.

22 Q. I mean preparing?

23 A. No.

24 Q. Did anyone request any input from you

## APPENDIX 6

Simonds Industries Inc.  
 Domestic Terminations in 2000 (133)  
 Total Domestic Employee Population (804)

CODES: (followed by date XX/00)

**Employees**

24	RIF	Reduction in Force; Positions Eliminated
41	RES/REP	Resignation/Replaced
11	RES/NREP	Resignation/Not Replaced
7	RET/REP	Normal Retirement/Replaced
5	RET/NREP	Normal Retirement/Not Replaced
10	TC/REP	Termination for Cause/Replaced
1	TC/NREP	Termination for Cause/Not Replaced
4	TBR/REP	Termination for Business Reasons/Replaced
8	TBR/NREP	Termination for Business Reasons/Not Replaced
0	DIS/REP	Permanent Disability/Replaced
3	DIS/NREP	Permanent Disability/Not Replaced
1	CON	Consultant Status
14	REH	Rehired After Termination
5	REA	Reassigned within the Company without Termination

[N.B. To date in 2000, fifty-seven (57) positions have been eliminated by the RIF or normal attrition.]

<u>NAME</u>	<u>POSITION</u>	<u>AGE</u>	<u>CODE/DATE</u>
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Fitchburg Facility in Fitchburg, Massachusetts

Ackles, Nancy	Secretary/Clerk	67	RIF 01/00
Alberghini, Louis	Engineer	60	RIF/REH 02/00
Allaire, Christopher	Hourly	30	RES/REP 02/00
Anderson, Maxwell	Hourly	20	RES/REP 04/00
Bourque, James	Mfg. Manager/Wood	48	RIF/REH 02/00
Burdick, Jeanne	Inside Sales	52	DIS/NREP 10/99
Chase, John	Credit Manager	51	RES/REP 02/00
Colon, William	Hourly	57	TBR/REP 10/99
Demers, Roland	Hourly	67	RET/NREP 12/99
Deedrick, Robert	VP-Marketing	57	CON
DeRivera, Eric	Engineer	43	RES/REP 12/99
DeVilling, Skip	VP-Bus. Development	58	TBR/NREP 01/00
Edmands, Karl	Hourly	46	REA
Evans, James	Sales	40	RES/REP 01/00
Ferguson, William	Hourly	63	RET/REP 05/00
Ibanez, Jorge	Hourly	19	TC/REP 07/00
Lanides, Victoria	Health/Benefits	57	RIF 01/00
Lake, Roger	Sales	58	TC/REP 12/99
Larsen, Ronald	Mfg. Manager/Metal	61	RIF 01/00
Marien, Chris	Hourly	33	TC/REP 04/00
McCarthy, Mark	Hourly	62	RET/NREP 05/00
May, Steve	Hourly	28	RES/REP 03/00
Perry, Richard	Hourly	62	RET/NREP 04/00
Rodriguez, Roland	Facility Coordinator	37	RES/REP 02/00
Schrenk, Chris	Sales	33	RES/REP 01/00
Sedycias, Steve	Hourly	20	TBR/REP 10/99
Souliere, Richard	Mfg. Manager/Paper	59	DIS/NREP 08/99
Spence, Tim	Engineering	25	RES/REP 03/00
Sylvester, Amy	Cost Analyst	33	RES/REP 01/00
Therault, Harold	Hourly	62	RET/REP 05/00
Walsh, Robert	Accounting	40	RES/REP 01/00
Warner, Fred	Programmer	37	RES/NREP 10/99
Watson, Steve	Hourly	47	RES/REP 04/00

TOTAL TERMINATIONS (33)

AVERAGE AGE TERMINATED (46.42)

TOTAL POPULATION (377)

AVERAGE AGE TOTAL POPULATION (47.84 salaried; 46.94 hourly)

Armstrong Facility in Portland, Oregon

Aguirre, Benjamin	Hourly	21	RES/NREP 04/00
Ardeleanu, Corneliu	Hourly	51	RIF 08/00
Atkins, William	Hourly	40	RIF 08/00
Brady, Joseph	Hourly	61	DIS/NREP 02/00
Browne, Isaac	Hourly	19	RIF 01/00
Collard, John	Production Planner	55	RIF 01/00
Delmazzo, Larry	Hourly	51	RIF 06/00
Ferguson, Debra	Hourly	45	RES/NREP 08/00
Helton, Robert	Hourly	46	RES/NREP 07/00
Hockert, Danny	Manager	58	RES/NREP 06/00
Holmes, Dennis	Hourly	34	RIF 06/00
Huffman, James	Hourly	29	RIF 06/00
Ladbury, Richard	Manager	46	RIF 01/00
Leissen, Gregory	Hourly	41	RIF 08/00
Long, Michael	Hourly	31	RES/NREP 07/00
Madsen, Robert	Hourly	58	RIF 08/00
Mitchum, Robert	Hourly	25	RIF 06/00
Northern, David	Hourly	29	RIF 06/00
Pemberton, Chris	Engineer	29	RIF 01/00
Phillips, Chris	Hourly	23	RES/NREP 05/00
Pohler, Alan	Hourly	36	RIF 08/00
Price, Eldon	Engineer	42	RES/NREP3/00
Stewart, Leslie	Hourly	57	RIF 08/00
Thompson, Tracy	Manager	35	RIF 01/00
Tucker, Bradley	Hourly	51	RIF 08/00

TOTAL TERMINATIONS (25)  
 AVERAGE AGE TERMINATED (39.36)  
 TOTAL POPULATION (85)  
 AVERAGE AGE TOTAL POPULATION (41.00)

## Big Rapids Facility in Big Rapids, Michigan

Bolton, Ken	Hourly	36	REA
Bone, Shawn	Hourly	40	RES/REP 04/00
Burson, Edward	Hourly	49	RES/REP 02/00
Chiles, Sean	Hourly	32	RES/REP 11/99
Cobb, Benjamin	Hourly	22	REH 04/00
Cole, David	Manager	28	RIF 01/00
Cook, Gordon	Engineer (Temp)	26	RIF 12/99
Decatur, Aron	Hourly	42	RES/REP 08/00
Doxtater, Matthew	Hourly	22	RES/REP 12/99
Dunklee, Michael	Hourly	20	TC/REP 08/00
Everim, Michael	Hourly	22	RES/REP 05/00
Fish, James	Hourly	38	REH 04/00
Giese, Keith	Hourly	28	RES/REP 05/00
Ingraham, Ken	Hourly	25	RES/REP 05/00
Johnson, Jay	Hourly	36	REH 01/00
Johnson, Orin	Hourly	41	REH 05/00
Johnston, Richard	Engineer	36	RIF 01/00
Jones, Brent	Hourly	28	RES/REP 04/00
Kailing, Terry	Hourly	25	RES/REP 05/00
Kirk, William	Purchasing	65	RET/NREP 04/00
London, Kevin	Hourly	44	RES/REP 07/00
McCarthy, Gary	Hourly	23	RES/REP 05/00
Olds, Leslie	Hourly	24	RES/REP 05/00
Paul, William	Hourly	36	RES/REP 04/00
Roak, Edward	Salaried	67	RET/NREP 02/00
Roberts, Joseph	Hourly	37	RES/REP 05/00
Sanford, Robin	Hourly	41	RES/REP 05/00
Skinner, Gregory	Accountant.	34	RES/NREP 11/99
Vanderhoof, Evan	Hourly	35	RES/REP 06/00
Wilkinson, Scott	Hourly	36	RES/REP 03/00
Wood, Jill	Customer Service (PT)	24	RIF 12/99
Wrench, Ruth	Technician	35	RES/REP 06/00
Wright, Dale	Hourly	18	RES/REP 08/00

TOTALS (33)

AVERAGE AGE TERMINATED (33.79)

TOTAL POPULATION (116)

AVERAGE AGE TOTAL POPULATION (39.54)

Newcomerstown Facility in Newcomerstown, Ohio

Baumgardner, Lillian	Hourly	53	REH 01/00
Boelens, David	Manager	42	TBR/NREP 11/99
Coventry, Jay	Engineer	40	RES/REP 08/00
Elliott, David	Hourly	52	REA
Fogle, John	Plant Manager	53	TBR/REP 02/00
Gardner, Burris	Hourly	54	REA
Griffith, Melody	Cost Analyst	51	RES/NREP 12/99
Heston, Raymond	Hourly	64	RET/REP 04/00
Heston, Timothy	Hourly	47	REA
Jaras, Anthony	Hourly	25	REH 01/00
Kirk, John	Hourly	36	REH 02/00
Kmatz, Sylvia	Quality Assurance	46	TBR/NREP 11/99
Lindell, Chet	Hourly	64	RET/REP 04/00
Martin, Gary	Hourly	62	RET/REP 06/00
McCray, Scott	Supervisor	39	TBR/NREP 01/00
McKibben, Michael	Hourly	33	REH 04/00
Miller, Wayne	Environmental	53	REH 08/00
Parks, Kenneth	Hourly	62	RET/REP 01/00
Rose, Cindy	Hourly	33	REH 06/00
Shearer, Willis	Hourly	65	RET/REP 02/00
Stone, Todd	Hourly	34	REH 03/00
Urban, William	Hourly	54	REA
Watson, Don	Hourly	35	REH 01/00
Wright, Kevin	Hourly	37	RES/REP 06/00

TOTAL TERMINATIONS (24)

AVERAGE AGE TERMINATED (47.25)

TOTAL POPULATION (132)

AVERAGE AGE TOTAL POPULATION (47.83 salaried, 49.90 hourly)



## Springfield Facility in Springfield, Oregon

Farmer, Robert	Hourly	48	TC/REP 07/00
Harris, Roy	Hourly	46	RES/REP 01/00
Roberts, Gerald	Hourly	47	RES/REP 03/00

TOTAL TERMINATIONS (3)  
 AVERAGE AGE TERMINATED (47.00)  
 TOTAL POPULATION (36)  
 AVERAGE AGE TOTAL POPULATION (39.33)

## Dallas Saw Facility in Dallas, Texas

Mendoza, Fermin	Hourly	34	TBR/NREP 06/00
Mitchell, Carlos	Hourly	41	TBR/NREP 06/00

TOTAL TERMINATIONS (2)  
 AVERAGE AGE TERMINATED (37.50)  
 TOTAL POPULATION (12)  
 AVERAGE AGE TOTAL POPULATION (43.08)

## Notting Facility in Riverside, California

Bonnell, Brian	Manager	50	RES/REP 08/00
Byrne, James	Hourly	53	TC/REP 01/00
Cooks, Bernard	Hourly	42	TC/REP 07/00
Hamilton, Donald	Hourly	54	TC/REP 01/00
Henry, David	Hourly	25	TC/REP 02/00
Martin, Linda	Customer Service	51	TBR/NREP 12/99
Perry, Allan	Engineer	53	TBR/REP 12/99
Pitcher, Colin	President	55	TBR/NREP 01/00
Poulin, Edward	Hourly	42	TC/REP 02/00
Rogers, Howard	Manager	50	RES/NREP 06/00
Rosenbrook, Mark	Manager	41	TC/NREP 01/00
Salinas, Luis	Hourly	26	RES/REP 02/00
Taylor, Kirk	Hourly	43	RES/REP 05/00

TOTAL TERMINATIONS (13)  
 AVERAGE AGE TERMINATED (45.00)  
 TOTAL POPULATION (46)  
 AVERAGE AGE TOTAL POPULATION (41.39)

SIMONDS INDUSTRIES INC. (DOMESTIC)  
GRAND TOTALS TERMINATED (133)  
AVERAGE AGE TERMINATED (41.85)  
TOTAL POPULATION (804)  
AVERAGE AGE TOTAL POPULATION (45.14)